REMARKS

Claims 1-25 are pending in the present application, of which Claims 1, 7, and 19 are in independent form. Claims 1, 2, 7, 8, 10, 11, 12, and 19-22 are amended to recite methods and systems for navigating a collection of tree data structures to identify "a plurality of trees." Support for these amendments may be found in the present application as published (U.S. Publication No. 2005/0065965) at least at paragraphs [0021], [0027], [0073], and Figures 4 and 6. For at least the reasons set forth in detail below, Applicants respectfully submit that Claims 1-25 are in condition for allowance.

Rejection under 35 U.S.C. § 102(b)

In the Office Action, Claims 1-25 stand rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,411,957 (herein "Dijkstra"). It is well-established that for a reference to defeat a claim's novelty under 35 U.S.C. § 102, it must disclose each and every element of the claim. Applicants respectfully request that this rejection be withdrawn because Dijkstra fails to teach each and every claim limitation called for in Claims 1-25 as amended.

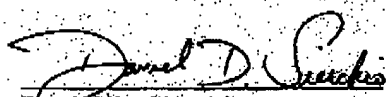
Claims 1-25 as amended call for a methods and systems for navigating a collection of tree data structures using a query tree to identify a plurality of trees in a collection of tree data structures. (U.S. Publication No. 2005/0065965, paragraph [0021], [0027], [0073]).

In contrast, Dijkstra teaches a system and method for organizing nodes within a single tree structure. (Dijkstra, column 1, lines 6-10). More particularly, Dijkstra is directed to a system and method of organizing within a tree structure a plurality of nodes representing physical entities. (Dijkstra, Abstract). In the Office Action, the Examiner cites column 1, lines 34-53 of Dijkstra as teaching the identification of a plurality of trees. However, the cited paragraph of Dijkstra is directed to "organizing a tree in such a way" (line 34, emphasis added) that searches may be performed based on a selected key to identify a "particular node" (line 42).

Clearly, Dijkstra teaches the identification of nodes in a single tree - not a plurality of trees, as called for in Claims 1-25 of the present application.

Accordingly, because Dijkstra fails to teach each and every element of Claims 1-25, specifically the identification of a plurality of trees, the Applicants respectfully request that the 35 U.S.C. §102(b) rejection based on Dijkstra be withdrawn. For at least the reasons set forth above, Claims 1-25 are deemed to be in condition for allowance. Reconsideration and favorable action in this regard is earnestly solicited.

Respectfully submitted,



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